

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

In Re: Group Health Plan Litigation

Case No. 23-cv-00267 (JWB/DJF)

**PLAINTIFFS' UNOPPOSED
AMENDED MOTION FOR
PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

Pursuant to Rule 23(e) of the Federal Rules of Civil Procedure, Plaintiffs, by their counsel, hereby move this Court for entry of an Order: (1) certifying the Settlement Class for purposes of settlement; (2) appointing Plaintiffs Kelly Vriezen, Sandra Tapp, and Kaye Lockrem as representatives of the Settlement Class; (3) appointing Plaintiffs' Lead Counsel and the undersigned counsel as Settlement Class Counsel; (4) granting preliminary approval of the proposed Settlement; (5) approving the proposed form and manner of notice to the Settlement Class; (6) directing that the notice to the Settlement Class be disseminated by Settlement Administrator Atticus Administration, LLC, in the manner described in the Settlement Agreement and in the Declaration of Chris Longley; (7) establishing a deadline for Settlement Class members to request exclusion from the Settlement Class or file objections to the Settlement; and (8) setting the proposed schedule for completion of further settlement proceedings, including scheduling the final fairness hearing.

This Motion is based on the record in this case as well as: (1) Plaintiffs' Memorandum of Law in Support of Plaintiffs' Motion for Preliminary Approval of Class

Action Settlement and Notice Plan; (2) the Declaration of Christopher P. Renz in Support of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement and Notice Plan and attached exhibits; (3) the Declaration of Chris Longley on Behalf of Atticus Administration, LLC; and (4) the Proposed Preliminary Approval Order that are served and filed herewith, as well as any additional materials or argument that may be presented to the Court.

Respectfully submitted,

Dated: August 30, 2024

s/ Christopher P. Renz

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